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Via ECF

Hon. Margo K. Brodie
United States Chief Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Tim Leissner*, No. 18-cr-439 (MKB)

Dear Judge Brodie:

We represent defendant Tim Leissner in the above-referenced matter. To better accommodate Mr. Leissner's new employment and relocation to the Northern District of Texas, we respectfully request that his bail be modified to remove the conditions of electronic monitoring and night curfew. We ask that Mr. Leissner's supervision be converted to regular supervision by Pretrial Services.

We have discussed this request with the Eastern District of New York's Pretrial Service Office, who do not object to this proposed modification. The government, by A.U.S.A. Drew Rolle, indicated that the government takes no position on this request.

Because of credible concerns regarding Mr. Leissner's safety while on pretrial release, we further request that the Court file this letter and any subsequent order under seal. *See, e.g., In re Applications to Unseal 98 CR 1101(ILG)*, 568 F. App'x 68, 70 (2d Cir. 2014) (affirming sealing order based, in part on "safety of persons or property"). The government takes not position on this sealing request.

Respectfully yours,

/S/HEM

Henry E. Mazurek
Ilana Haramati
Counsel for Defendant Tim Leissner